



January 28, 1980

RECEIVED

U.S. Consumer Product Safety Commission
5401 Westbard Avenue
Washington D.C. 20207

JAN 31 1980

Division of Product Defect Correction
Compliance and Enforcement
CPSC

Attention: Ms. Sandra C. Shimasaki
Hazard Correction Branch

Re: CPSC I.D. 80-16
Voluntary Corrective Action Plan - Fun Fountain Toys

Gentlemen:

Re your letter of January 8, 1980, please be advised as follows:

1. Enclosed with our letter to customers will be an order form and postage paid, pre-addressed envelope to assist customers in ordering retrofit units for Fun Fountain Toys in inventory. We believe this will be better than a postcard which could be lost.
2. The point of purchase poster will be revised and printed as per your suggestions.
3. The envelope containing the mailing to customers will have printed thereon "Important Safety Information Enclosed".
4. Our Customer Service Department will set up the following mechanism to monitor the effectiveness of the corrective action program.
 - a. It will have a computer print-out of all customers who purchased the product in years prior to 1980. An envelope containing all information will be mailed to all such customers. All such customers will also receive an initial supply of six (6) retrofit units, each individually packaged and containing an instruction sheet. Requests for additional retrofit units and for additional information packets will be separately monitored.
 - b. All requests for retrofit units from customers, (i.e. wholesalers, distributors, retailers, chains) to modify inventory will be separately monitored as to date, name, address, number of units, etc.

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- c. All request for retrofit units from consumers will be separately monitored as to date, name and address.
5. We are sending you under separate cover, three (3) retrofit units typical of those being used to modify 1979 inventory. These will be in a clear plastic bag together with an instruction sheet which is presently being drafted.
6. We further intend to modify the first paragraph of our letter to our customers by striking,

"This Program has been approved by The U.S.
Consumer Product Safety Commission."

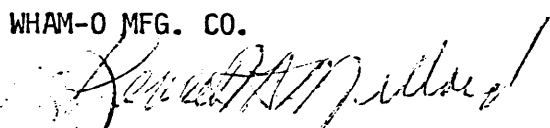
and substituting in lieu thereof the following:

"This Program has been determined to be
adequate by the staff of the Hazard Correction
Branch of The U.S. Consumer Product Safety
Commission."

7. We are in the process of making the foregoing changes - drafting, packaging, etc. and expect the same to be completed within 10 working days. We will send you final package prior to distribution. We are shipping new product containing the waterflow control valve and old inventory with retrofit units. We would appreciate draft of proposed press release as soon as possible.

Very truly yours,

WHAM-O MFG. CO.


Kenneth A. Millard
Vice President, General Counsel

KAM:1a

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and sold by Wham-O after November 30, 1979 will contain such a valve. All Wham-O inventory of such product will be modified to insert such a valve.

7. See (6) above.
8. With regard to product in the distribution chain, Wham-O has developed an insert containing such a water flow control valve to be inserted into the hose connector of such product. Such insert and product containing the same have been furnished to and tested by the staff of the CPSC. All Wham-O customers, wholesalers and retailers will be furnished with a reasonable supply of such inserts, without charge and requested to modify product in their inventory. Retailers will be requested to post the Consumer Notice noted in 2(c) above and to furnish consumers with inserts, without charge, upon request. Wham-O also will furnish consumers such inserts without charge, upon request. Wham-O hopes to initiate its Corrective Action Program in January 1980. Wham-O believes that there are approximately 500,000 units of such product in the distribution chain, substantially all of which are in the possession of consumers.
9. Wham-O hereby acknowledges that the CPSC may monitor the corrective action and will furnish the necessary information to the CPSC, including customer lists.
10. Wham-O agrees that the CPSC may publicize the terms of the Corrective Action Plan to the extent necessary to inform the public of the nature and extent of the alleged substantial product hazard and of the action being undertaken to correct the alleged hazard presented.
11. While Wham-O acknowledges that the corrective action plan for the purposes of 16 CFR 1115.20 becomes effective only upon its final acceptance by the CPSC,

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in view of the fact that the staff of the CPSC has tested product containing the water flow control valve mentioned above and found such valve "to be satisfactory in reducing the risk of injury associated with the subject toy" (CPSC letter dated 12/10/79), Wham-O intends to forthwith manufacture and sell new product containing such a valve and modify its existing inventory to insert such a valve and sell such inventory. In this regard Wham-O has already contacted its toy sales reps and salesmen and requested that they contact their major accounts, with regard to new production of the product for sale to consumers in 1980. Copies of such communications dated December 14, 1979 are enclosed herewith.

12. The submission of this corrective action plan does not constitute an admission by Wham-O that either reportable information or a substantial product hazard exists.
13. With regard to the statement in your letter of November 14, 1979 re notice of your intention to release certain factual information to the public, we have three requests, namely:
 - a. That no information be released until a Corrective Action Plan has been approved by the CPSC;
 - b. That the information be released by means of a joint Wham-O - CPSC press release; and
 - c. That any information released be purged of the number of units of the product heretofore manufactured and sold by Wham-O and the number of units now in inventory. As per your direction a copy of the Hazard Assessment Committee memorandum so purged is enclosed herewith. Such

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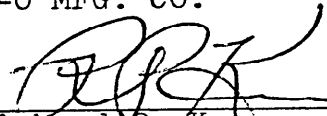
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information, as per our letter to you of
August 9, 1979, is considered exempt from
disclosure under the Freedom of Information
Act.

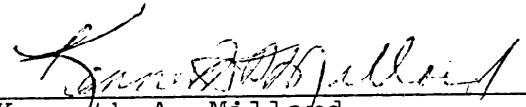
Very truly yours

WHAM-O MFG. CO.

By


Richard P. Kneer
Vice President, Co-Chairmen Board of Directors

By


Kenneth A. Millard
Vice President, General Counsel

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enclosures

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WHAM-O-GRAM

December 14, 1979

BULLETIN #143

TO: ALL TOY REPS

FROM: Dick Moe

SUBJECT: FUN FOUNTAIN, STOCK NO. 237

The attached letter regarding the above product is self-explanatory.

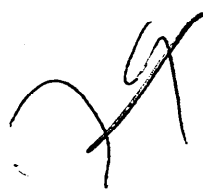
So that we can eliminate many questions from your accounts and the possible loss of orders, we would like you to do the following now:

1. Send a copy of the enclosed letter immediately to each of your major accounts or any that you deem necessary that have purchased or will purchase Fun Fountain. Please call if you need additional copies.
2. After mailing the letter, follow-up by phone or in person with each buyer to assure him that the basic corrective measure (the addition of a water flow control valve) has been approved by the staff of the Consumer Product Safety Commission as "satisfactory."
3. Send me a list of accounts in your area and dates that the letter was sent to them.

A complete Corrective Action Program will be forthcoming as soon as we have approval from the CPSC staff. This will basically pertain to units sold in 1977, 1978, and/or 1979. We repeat that this is not a Recall. No returns are necessary nor will they be accepted. Please assure your accounts that all new production will have the water flow control valve and that they will be getting full details shortly as to how to convert any Fun Fountains in inventory.

If you have any questions, please give me a call. Please send the enclosed letter to your major accounts immediately. This should have no effect on your listings or projected sales.

Attachments

Dick 69 



December 14, 1979

Re: Fun Fountain, Stock No. 237

Dear

The staff of the Consumer Product Safety Commission has recently made a preliminary determination that the Wham-O Fun Fountain toy presents a substantial product hazard as defined in Section 15 of the Consumer Product Safety Act. This preliminary determination was made on the basis of two apparently minor and non-permanent eye injuries allegedly suffered by children late in 1979, as a result of being struck in the eye by the stream of water from the product. These alleged injuries apparently occurred in localities having high water pressure.

Wham-O does not agree with the preliminary determination of the staff of the CPSC. Nevertheless, Wham-O has modified the product by the addition of a water flow control valve, which substantially decreases, limits and keeps constant the amount of water from the product under varying water pressures. This valve eliminates any potential risk of injury of this source without detracting from the play value of the product. All product manufactured and sold after November 1979 will contain such a water flow control valve.

FUN FOUNTAINS CONTAINING SUCH A WATER FLOW CONTROL VALVE HAVE BEEN TESTED BY THE STAFF OF THE CPSC AND DETERMINED BY THEM TO BE SATISFACTORY.

Wham-O is about to institute a Voluntary Corrective Action Program with regard to this product and expects to submit such program to the CPSC for its approval shortly. Such a Voluntary Corrective Action Program will consist of the addition of a water flow control valve in all new production, a method of notice of the program and a method of distributing similar water flow control valves for insertion in products previously sold by Wham-O. We believe this program will be accepted as satisfactory by

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the CPSC and will forward you full details of it as soon as approved.

We wish to assure you that all new production of Wham-O Fun Fountains, stock no. 237, will fully comply with the requirements of the CPSC, so that you may make your 1980 sales plans for this product accordingly.

Very truly yours

WHAM-O MFG. CO.

By *Dick Moe*
Dick Moe
General Sales Manager

DM/sch

71 *[Signature]*

WHAM-O-GRAM

January , 1980

BULLETIN # _____

TO: All Toy Reps and Salesmen

FROM: Dick Moe
General Sales Manager

SUBJECT: NOTICE OF VOLUNTARY CORRECTIVE ACTION PROGRAM
ON #237 - FUN FOUNTAIN

Attached are copies of letters explaining above subject that are being sent to all jobbers, redistributors and retailers, which our records reflect, have purchased Fun Fountains in the years 1977, 1978 and 1979.

This material consists of:

1. "Notice of Voluntary Corrective Action Program"
2. "Consumers Notice of Voluntary Corrective Action Program" for posting in retail stores.

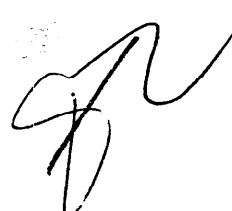
We wish to emphasize that this is not a recall.

RETURNS ARE NOT NECESSARY, NOR ACCEPTABLE

Please read this material carefully, so that you can reassure your customers and anticipate any questions they may have.

A quantity of "Water Flow Control Valves" will be sent to all redistributors, chains and retailers. Additional valves may be obtained by contacting Customer Service and a supply is being sent to you so that you may modify your samples.

If you have any questions, please call Customer Service or me for assistance.

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January , 1980

TOY BUYER OR MANAGER

RE: NOTICE OF VOLUNTARY CORRECTIVE ACTION PROGRAM,
WHAM-O FUN FOUNTAIN TOY, STOCK NO. 237

Dear Customer:

Wham-O is voluntarily initiating this CORRECTIVE ACTION PROGRAM with regard to its Fun Fountain Toy, Stock No. 237. This Program has been approved by the U.S. Consumer Product Safety Commission. This Notice is to inform you of the problem, the solution to the problem, and the action requested of you.

THIS IS A VOLUNTARY CORRECTIVE ACTION PROGRAM AND NOT A RECALL. NO PRODUCT RETURNS ARE NECESSARY NOR WILL THEY BE ACCEPTED.

1. THE PROBLEM:

On November 14, 1979, the staff of the Consumer Product Safety Commission made a preliminary determination that the Wham-O Fun Fountain toy presents a substantial product hazard as defined in Section 15 of the Consumer Product Safety Act. This preliminary determination was made on the basis of two apparently minor and non-permanent eye injuries allegedly suffered by children late in 1979, as a result of being struck in the eye by the stream of water from the product. These alleged injuries apparently occurred in localities having high water pressure.

2. THE SOLUTION:

Wham-O does not agree with the preliminary determination of the staff of the CPSC. Nevertheless, Wham-O has modified the product by the addition of a water flow control valve, which substantially decreases, limits

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Toy Buyer or Manager
January , 1980
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and keeps constant the amount of water from the product under varying water pressures. In Wham-O's opinion the addition of this valve eliminates any potential risk of injury of this source without detracting from the play value of the product.

FUN FOUNTAINS CONTAINING SUCH A WATER FLOW CONTROL VALVE HAVE BEEN TESTED BY THE STAFF OF THE CPSC AND ON DECEMBER 10, 1979 WERE DETERMINED BY THEM TO BE "SATISFACTORY IN REDUCING THE RISK OF INJURY ASSOCIATED WITH THIS TOY."

a. Future Shipments of Redesigned Fun Fountains by Wham-O:

All Fun Fountains shipped by Wham-O after December 1, 1979, will contain the new water flow control valve.

All such redesigned product will be readily identifiable by:

- (1) The hose connector which is BLUE, and the individual carton in which the product is packaged has an "IMPORTANT" notice on the front panel and a "SAFETY CHECK LIST" on the back panel.
- (2) A limited quantity of Fun Fountains currently in Wham-O's inventory have a RED hose connector and have been modified by the insertion of a clearly visable BLUE Water Flow Control Valve insert. Such product is packaged in an individual carton which has the "IMPORTANT" notice and "SAFETY CHECK LIST" on the carton.

b. Modification of Fun Fountains Previously Shipped by Wham-O:

Fun Fountains previously manufactured and shipped in 1977, 1978 and 1979 did not contain a water flow control valve.

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Toy Buyer or Manager
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These products may be identified by a RED Hose Connector. Also the individual carton in which they are packaged does not contain a prominent "IMPORTANT" notice on the front panel and does NOT contain a "SAFETY CHECK LIST" on the back panel.

Wham-O has designed a Blue Snap-in Water Flow Control Valve Insert which can easily be inserted in the Hose Connector of such products and once inserted cannot be removed. Such inserts will be made available by Wham-O without charge to all wholesalers, retailers and consumers who purchased such products and should be inserted in the Hose Connector of all Fun Fountains having a RED HOSE CONNECTOR, which have not already been modified by the addition of such insert.

3. YOUR PART IN THE CORRECTIVE ACTION PROGRAM:

Our records indicate that you purchased Fun Fountain toys, stock no. 237 in 1977, 1978 and/or 1979. We urgently request your assistance and cooperation in implementing this Corrective Action Program as follows:

- a. Please check your inventory and advise us of the number of Fun Fountain toys you have in stock. We will send you a supply of BLUE water flow control valve inserts which we request you snap in the hose connector of such toys and a supply of "IMPORTANT" notices and "SAFETY CHECK LISTS" to be affixed to the individual cartons in which the product is packaged.
- b. If you are a Jobber, Redistributor, or a Retail Chain, please notify your customers and/or Retail Outlets of this "Corrective Action Program" and furnish them with copies of this notice and enclosed material. Additional copies of this notice, the Consumer Notice to be posted in the Retail Store and BLUE Water Flow Control Valve Inserts, may be ordered by contacting our Sales

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Toy Buyer or Manager
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Representative or our Customer Service Department
by mail or by calling on our WATS line
(800) 423-4174 or (213) 287-9681.

- c. If you are a Retailer, please post the enclosed "Consumer Notice of Corrective Action" in a conspicuous place in your toy department or near your cash register and furnish the consumer, upon request, a BLUE Water Flow Control Valve Insert. An initial supply of such inserts is being sent to you under separate cover. Additional inserts may be ordered by contacting our Sales Representative or our Customer Service Department by mail or by calling on our WATS line (800) 423-4174 or (213) 287-9681.

Your assistance and cooperation in implementing this program is greatly appreciated.

If you have any questions, please call me.

Sincerely

WHAM-O MFG. CO.

By _____
Dick Moe
General Sales Manager

DM/sch

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CONSUMER NOTICE
OF VOLUNTARY
CORRECTIVE ACTION PROGRAM
WHAM-O FUN FOUNTAIN #237
JANUARY , 1980

A potential hazard may exist with regard to the Fun Fountain toys pictured below (Fig. 1 & 2), which were manufactured prior to January 1980. In areas of extremely high water pressure, the stream of water emitted from the product may be uncomfortable to the touch and may cause injury to sensitive parts of the human body.

All Fun Fountain toys manufactured after December 1979, contain a water flow control valve, which eliminates this potential problem. Such product is readily identifiable by its BLUE hose connector (Fig. 3), or if in its individual carton, by the "IMPORTANT" notice and "SAFETY CHECK LIST" on the carton.

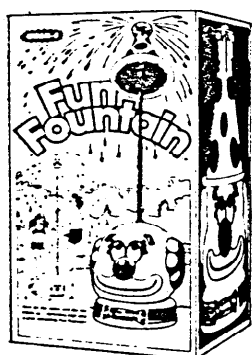


Figure 1

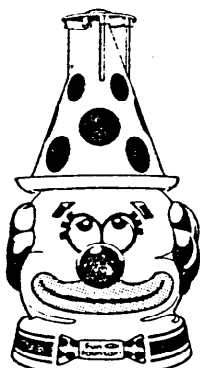


Figure 2

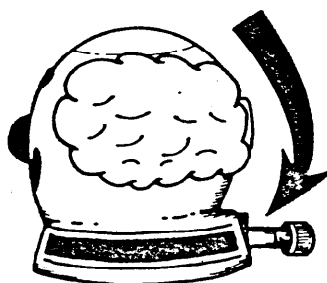


Figure 3

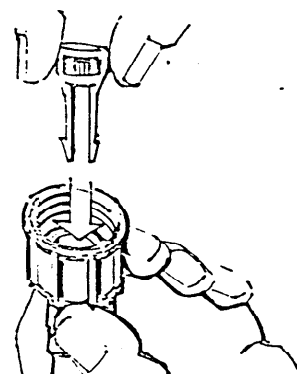


Figure 4

Persons who have previously purchased this product should check the hose connector.

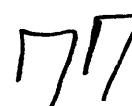
1. If the hose connector is BLUE, it already contains a water flow control valve.
2. If the hose connector is RED, but contains a BLUE insert clearly visible, it already contains a water flow control valve.
3. If the hose connector is RED and does not contain a clearly visible BLUE insert, please ask the store manager for a free water flow control valve insert (Fig. 4) or contact:

Customer Service, Dept. 7
Wham-O Mfg. Co.
835 East El Monte Street
San Gabriel, California 91778

(800) 423-4174 or (213) 287-9681 and an insert will be mailed to you free of charge.

The insert will eliminate the potential problem. Push the insert into the hose connector. It snaps in place easily and permanently.

THIS IS NOT A RECALL. NO RETURNS WILL BE ACCEPTED.



FUN FOUNTAIN® PACKAGE

FRONT OF PACKAGE:

IMPORTANT

Recommended for children 5 years and over. Adult supervision recommended. Before using FUN FOUNTAIN see back of box for INSTRUCTIONS and SAFETY CHECK LIST.

BACK OF PACKAGE:

Recommended for children 5 years and over.
Adult supervision recommended.

SAFETY CHECK LIST

1. ☐ Be sure to set up FUN FOUNTAIN only on a soft lawn surface. Do not use FUN FOUNTAIN on hard surfaces such as concrete or asphalt. Such surfaces become slippery when wet and can cause falls resulting in serious injuries.
2. ☐ Before using and periodically during use, be sure to check under and around FUN FOUNTAIN for sharp objects, rocks, sticks, dog bones, lawn sprinklers or any object which can cause an injury.
3. ☐ Be sure to have adult supervision.
4. ☐ To be used by children, 5 years and over.
5. ☐ Do not allow children to sit on the clown head or look into the nozzle on top of the head whether or not the water is turned on. A surge of water can cause physical discomfort or injury.
6. ☐ Do not permit children to pick up the FUN FOUNTAIN and direct the stream of water at other children.
7. ☐ Be sure that children are wearing bathing suits or other suitable garments.
8. ☐ Be sure to detach and store your FUN FOUNTAIN when not in use.
9. ☐ Be sure to turn water on slowly and only enough to raise the hat to a height of 8 to 10 feet.

UNITED STATES GOVERNMENT

U.S. CONSUMER PRODUCT
SAFETY COMMISSION

Memorandum

TO : FILE
Through: Catherine C. Cook, Director, CEPD CCC
Through: Hazard Assessment Committee 7BP
FROM : Sandra C. Shimasaki, Project Officer, CEPD SM
DATE: November 13, 1979
SUBJECT: Hazard Assessment Committee Recommendation for Preliminary
Determination for HEB 79-2362; Wham-O Manufacturing Company,
San Gabriel, California; Fun Fountain Water Toy

Recommendation

The Hazard Assessment Committee (HAC) believes the Fun Fountain water toy presents a substantial product hazard and recommends corrective action be sought.

Product

The Wham-O Fun Fountain toy is a water toy consisting of a clown head and hat. The clown head portion is attached to the garden hose. When water is turned on, a stream of water shoots out of a nozzle in the top of the clown head. The clown hat is held suspended in the air by the force from the stream of water and can rise up to 15 feet depending on the water supply pressure. The toy can be used with or without the hat.

Date of Investigation

The Hazard Evaluation Branch (HEB) of CEPD wrote to Wham-O Manufacturing Co. on August 1, 1979 with respect to a CPSC in-depth investigation (IDI). The IDI involved a 6-year old child who suffered an eye injury from the pressurized stream of water coming from the Fun Fountain toy. A closed meeting was held with representatives of Wham-O on October 23, 1979 to discuss the matter.

Date of Meeting

October 23, 1979

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Wham-O received an additional report of a child sustaining hyphema to his eye. Wham-O reports the hose may have been kinked and then let out while the child's face was over the toy. Consequently, the stream of water hit the child in the eye.

Wham-O reported two other safety-related complaints which occurred as the result of the child allegedly sitting on the clown head (hat removed) over the stream of water. These children reportedly suffered minor or no injury.

The HAC recognizes that the Fun Fountain designed as a clown's head makes it appealing and attractive to children. It is believed that such a toy would invite the curiosity of children to explore how the toy works, i.e., to find out where the water is coming from.

If the child's face is over the toy, under certain circumstances (e.g., when the water was turned on or when the hose was unbent after being kinked while the water was on, or other possible scenarios) eye injury could result from the stream of water hitting the eye.

The HAC considered the likelihood of injury as not improbable.

(c) Assessment - The HAC considered the severity of risk as moderately high since the population group exposed is children and eye injury could occur.

4. Other Considerations: After discussions with the representatives from Wham-O, the HAC believes that the Fun Fountain toy could be made safer for use by children (existing and future production units) without imposing an undue economic burden on the company.

5. Assessment of Substantiality of Risk: Based on the pattern of defect in a large number of products, the moderately high severity of risk to children and the economic considerations, the HAC assessed the risk of injury as substantial.

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ATTACHMENT 2

COMPANY: Wham-O Manufacturing Company

COMPANY ADDRESS: 835 East El Monte Street
San Gabriel, California 91778

PRODUCT DESCRIPTION: The Wham-O Fun Fountain toy is a water toy consisting of a clown head and hat. The clown head portion is attached to the garden hose. When water is turned on, a stream of water shoots out of a nozzle in the top of the clown head. The clown hat is held suspended in the air by the force of the stream of water and can rise up to 15 feet depending on the water supply pressure. The toy can be used with or without the hat.

BRAND NAME: Wham-O

MODEL AND/OR SERIAL NUMBERS: Stock number 237

PRODUCTION AND/OR DISTRIBUTION DATES: 1977, 1978 and 1979

PRODUCTION DATE CODES: None


NUMBER OF PRODUCTS INVOLVED

DEFECT AND HAZARD: The staff believes the Fun Fountain toy is designed such that it invites children to look into the nozzle and that the force with which the water can come through the nozzle is such that it may cause eye injury upon impact. Other injuries may occur as a result of sitting on the stream of water shooting out of the toy.

INCIDENTS OR INJURIES ASSOCIATED WITH THE PRODUCT (NUMBER AND SEVERITY): Two reported incidents of eye injury (hyphema) to children who were struck in the eye from the stream of water coming out of the nozzle of the toy.

Also two reported safety-related complaints which occurred as the result of the child allegedly sitting on the clown head (hat removed) over the stream of water. These children reportedly suffered minor or no injury.

COMPANY ACTION: Design changes for future production. Other remedial action to be determined.

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November 30, 1979

Ms. Sandra Shimasaki
Product Defect Correction Division
Consumer Product Safety Commission
Room 200
5401 Westbard
Washington, D.C. 20207

DEC 3 1979
U.S. DEPARTMENT OF COMMERCE
CONSUMER PRODUCT SAFETY COMMISSION

Re: Wham-O Fun Fountain, Stock #237

Dear Ms. Shimasaki:

This letter and enclosures are pursuant to our telephone conversation of Tuesday, November 27, 1979.

For Mr. Rossi's review you will find enclosed three photographs showing our test stand and our impact test gauge. The following is a brief explanation of the photographs:

Photo #1 - This is the front of our test stand. The 4 GPM flow gauge is a dial type instrument calibrated in increments of 1/10 gallons per minute. This is used for more precise measurements at flow rates below 4 GPM. The 10 GPM gauge is obviously not as precise and is calibrated in increments of 1/2 GPM.

Photo #2 - Self explanatory

Photo #3 - This is a 0 to 80 ounce spring scale fitted with a hemispherical impact plate. The impact plate was clamped into a fixed position 8 inches above the nozzle on top of the clown's head. Incidentally, the readings on the impact gauge did not vary noticeably whether the gauge was 4 inches or 12 inches above the nozzle. Before conducting our tests, the spring gauge was calibrated against a laboratory quality balance beam scale and found to be accurate within one-half of an ounce.

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Ms. Sandra Shimasaki
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Also enclosed are measurement charts showing the readings taken from four different Fun Fountain products. Unit #1 was a current unmodified product without a flow control device. Unit #2 has a 2-1/2 GPM flow control device. Unit #3 has a 3 GPM flow control device. Unit #4 has a 3-1/2 GPM flow control device.

It is our conclusion that the Fun Fountain product needs a water flow control device with a nominal rate of 3-1/2 gallons per minute to operate properly. We feel that the force of the water striking the hand at this rate of flow is not uncomfortable to the touch. Of course, we agreed that the touch system was a subjective method of evaluation. However, the aforementioned measurement charts are helpful in relating touch to ounces of impact force. We feel that it is unlikely that the maximum impact force of 11.0 ounces, measured on Unit #4 at 120 P.S.I. could cause an injury.

We trust the foregoing is the information that you requested in our most recent telephone conversation.

In view of your staff's preliminary determination with respect to this product and the fact that the same has become public knowledge, we were contacted yesterday by a representative of the Product Safety Letter Organization and we felt obligated to discuss this matter. It is, therefore, most important to us that we resolve this matter at the earliest opportunity. We, therefore, request that you give this matter your earliest attention and call us when you have done so. We request that the foregoing information be treated as confidential in accordance with the request that we previously made to you.

Sincerely yours,

Darle L. Kerkenbush
Director of Research & Development

DLK/sch
enclosures

cc: Kenneth A. Millard

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RESTRICTED

UNIT # 1

FUN FOUNTAIN

RESTRICTED

STANDARD UNIT WITHOUT FLOW CONTROL DEVICE

Static Line Pressure Measured At The Faucet (PSI)	Rate of Flow (GPM)	Force Registered On Impact Gauge 8" From Nozzle (ounce)	COMMENTS
20	2.9	6.5	Hat barely lifts off of clown head.
40	4.2	16.0	More than sufficient force to operate product.
60	5.0	24.0	" " "
80	6.0	33.0	" " "
100	6.8	40.0	" " "
120	6.9	42.0	" " "

J. L. Whittington
 J.L. Whittington
 Manager Product Development
 Wham-O Mfg. Co.
 November 28, 1979

RESTRICTED